

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

LET EXPERIENCED PILOTS)	
FLY, INC.,)	
)	
Plaintiff,)	Case No. 1:24-cv-00736
)	
v.)	Honorable Franklin U. Valderrama
)	
AIR LINE PILOTS ASSOCIATION,)	
INTERNATIONAL,)	
)	
Defendant.)	
)	

**MOTION TO DISMISS FIRST AMENDED COMPLAINT
OF DEFENDANT AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

Defendant Air Line Pilots Association, International (“ALPA”) moves to dismiss Plaintiff Let Experienced Pilots Fly, Inc.’s claims for failure to state a claim under Rule 12(b)(6). Defendant’s motion is based on the supporting brief, declaration, and appendix filed herewith. Defendant requests that the Court dismiss Plaintiff’s claims with prejudice and enter a ruling in accordance with the proposed order.

Dated: March 20, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2024, I will file the attached Motion to Dismiss, Brief in Support, Declaration of Marcus C. Migliore, and Appendix with the Clerk of the United States District Court for the Northern District of Illinois, using the electronic case filing system which, based on current records, will result in service on the following:

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